

# **EXHIBIT 6**

UBER MDL DRAFT DISCOVERY SCHEDULE

<b>1</b>	<b>April 12, 2024</b>	<b>Uber</b> shall provide (1) a list of proposed custodians. For each custodian, Uber shall provide all job titles and dates for which the custodian held that title, as well as the date(s) for any litigation holds; (2) provide a list of non-custodial files that can be produced without the use of search terms and a date certain for production.
<b>2</b>	<b>April 15, 2024</b>	<b>Meet and confer</b> re: Uber's proposed list of custodians and production of non-custodial files.
<b>3</b>	<b>April 17, 2024</b>	<b>Uber</b> to provide Plaintiffs with a list of topical categories that it will object to in Plaintiffs' written discovery.
<b>4</b>	<b>April 19, 2024</b>	<b>Plaintiffs</b> to provide feedback and meet and confer on topical categories in an attempt to reach a resolution.
<b>5</b>	<b>April 23, 2024</b>	<p><b>For the categories where the parties have not reached agreement:</b></p> <p><b>Uber</b> shall (1) serve any initial objections to First RFPs that would result in the withholding of large portions of documents (i.e., objections that would be made to multiple First RFPs); (2) identify any First RFPs that objects to into their entirety; (3) identify any First RFPs that are fully covered by documents already produced in the JCCP and provide a date certain for producing those documents to Plaintiffs.</p> <p><b>Plaintiffs</b> will submit a proposed list of initial custodians. Uber shall respond by May 3 as to whether they will produce documents for those custodians.</p> <p>Additionally, <b>the parties</b> will exchange their proposed search terms.</p>

<b>6</b>	<b>April 26, 2024</b>	<b>Plaintiffs</b> will provide a proposed schedule for responding to First RFP's which will identify First RFPs to respond to by either May 10, 2024 or May 29, 2024.
<b>7</b>	<b>April 29, 2024</b>	<b>Meet and confer</b> re: Uber's initial objections to First RFPs, production of JCCP documents, Plaintiffs' proposed schedule for First RFP responses, and search terms.
<b>8</b>	<b>May 3, 2024</b>	<b>Uber</b> shall identify the custodians for which Uber will produce documents.
<b>9</b>	<b>May 6, 2024</b>	<b>Meet and confer</b> regarding search terms, custodians, and responses to First RFPs.
<b>10</b>	<b>May 13, 2024</b>	<b>Final meet and confer</b> regarding search terms, custodians, and responses to First RFPs.
<b>11</b>	<b>May 21, 2024</b>	<b>Uber</b> shall serve responses and begin a rolling production of documents pursuant to Plaintiffs' April 29 proposal and the parties' May 6 and May 13 discussions.
<b>12</b>	<b>May 28, 2024</b>	<b>Uber</b> shall serve initial objections to First Rog's and First RFA's.
<b>13</b>	<b>June 4, 2024</b>	<b>The parties</b> will submit any dispute over search terms or custodians to the Court.
<b>14</b>	<b>June 20, 2024</b>	<b>Uber</b> shall serve final objections and responses to First Rog's and First RFA's.
<b>15</b>	<b>June 27, 2024</b>	<b>Uber</b> shall serve final responses and objections to First RFPs. (Date subject to change, depending upon guidance from the court.)

<b>16</b>	<b>September 16, 2024</b>	<b>Uber</b> shall complete production of documents responsive to First RFPs, subject to the Courts' resolution of search terms and custodian disputes submitted on June 4.
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